

**REMARKS**

At the time of the Office Action dated March 28, 2005, claims 1-9 were pending. Applicants acknowledge, with appreciation, the Examiner's indication that claims 4-9 would be allowable if rewritten in independent form including all of the limitations of the base claim and any intervening claims. Claims 1-3 stand rejected.

In this Amendment, claim 1 has been amended to recite "said first and second cathode regions being non-contacting." Care has been exercised to avoid the introduction of new matter. Adequate descriptive support for the amendment can be found in, for example, Fig. 3 and relevant description of the specification.

**Foreign Priority.**

Applicants note that claim for foreign priority and receipt of the certified copies of the priority document filed in Patent Application No. 10/657,106 of which this application is a Continuation-In-Part, have not been acknowledged. Applicants hereby respectfully request that the Examiner clarify the record by acknowledging the claim for foreign priority and receipt of the certified copies of the priority documents.

**Claims 1-3 have been rejected under 35 U.S.C. §102(b) as being anticipated by Li et al.**

In the statement of the rejection, the Examiner asserted that Li et al. discloses an electrostatic-discharge protection circuit identically corresponding to what is claimed. In response, Applicants have amended claim 1 to recite "said first and second cathode regions being non-contacting." Based on this amendment, it is submitted that Li et al. does not disclose a

semiconductor device including “said diode having its cathode including a first cathode region and a second cathode region, ... said first and second cathode regions being non-contacting,” as recited in claim 1.

In paragraph 6 of the Office Action, the Examiner asserted that regions 440 and 465 in Fig. 4B of Li et al. correspond to the claimed first and second cathode regions. According to Fig. 4B, Li’s regions 440 and 465 are in contact with each other. Therefore, it is apparent that Li’s regions 440 and 465 are different from the claimed first and second cathode regions because the claimed cathode regions are non-contacting.

Accordingly, Applicants submit that Li et al. does not identically disclose a semiconductor device including all the limitations recited in claim 1, as amended. Dependent claims 2 and 3 are also patentably distinguishable at least because they respectively include all the limitations of independent claim 1. Applicants, therefore, respectfully solicit withdrawal of the rejection of claims 1-3 and favorable consideration thereof.

**Conclusion.**

It should, therefore, be apparent that the imposed rejections have been overcome and that all pending claims are in condition for immediate allowance. Favorable consideration is, therefore, respectfully solicited.

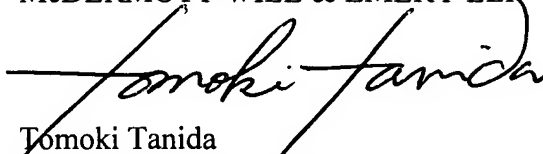
To the extent necessary, a petition for an extension of time under 37 C.F.R. 1.136 is hereby made. Please charge any shortage in fees due in connection with the filing of this paper,

**Application No.: 10/787,223**

including extension of time fees, to Deposit Account 500417 and please credit any excess fees to such deposit account.

Respectfully submitted,

McDERMOTT WILL & EMERY LLP

A handwritten signature in black ink, appearing to read "Tomoki Tanida", written over a horizontal line.

Tomoki Tanida

Recognition under 37 C.F.R. 10.9(b)

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